



ZACHARY W. CARTER
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

HANNAH V. FADDIS
Senior Counsel
phone: (212) 356-2486
fax: (212) 356-1148
hfaddis@law.nyc.gov

October 24, 2017

VIA ECF

Honorable Richard J. Sullivan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Kyron Bowden, et al. v. City of New York, et al.
16-cv-7888 (RJS) (RLE)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, assigned to represent Defendants City of New York, Biggs, Salmon, White, Smith, and Reid in the above-referenced matter. Defendants write to respectfully request that the Court: (1) facilitate the removal of certain confidential materials filed by the Plaintiff from public view on ECF; and (2) direct the Plaintiff to re-file the document under seal.

On October 17, 2017, the Court issued an order (ECF No. 75) directing the disclosure of the address of the named defendant Dr. Theodore Kramer pursuant to the stipulation of confidentiality and protective order in effect in this action, and further directing that any affidavit of service for Dr. Kramer be filed under seal. On October 24, 2017, the Plaintiff filed an affidavit of service for Dr. Kramer (ECF No. 78), which is publicly available on ECF. That affidavit of service has been partially redacted, but bears the GPS coordinates of the location where service was purportedly effected on Dr. Kramer.

Accordingly, as this document should not have been made public, Defendants are respectfully requesting that the Court: (1) facilitate the removal of this document filed by the Plaintiff from public view on ECF; and (2) direct the Plaintiff to re-file the document under seal, as previously ordered.

Defendants thank the Court for its consideration herein.

Respectfully submitted,

/s/

Hannah V. Faddis

Senior Counsel

Special Federal Litigation Division

cc: **VIA ECF**
Jessica Massimi, Esq
Attorney for the Plaintiffs
Law Office of Michael S. Lamonsoff
Financial Square
32 Old Slip, 8th Floor
New York, New York 10005